

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ALLIED WASTE NORTH AMERICA, LLC  
AND 623 LANDFILL, INC.,

PLAINTIFFS,

v.

INTERNATIONAL BROTHERHOOD OF  
TEAMSTERS, LOCAL 25, THOMAS G.  
MARI, INDIVIDUALLY AND AS  
PRESIDENT, STEVEN J. SOUTH, AS  
SECRETARY-TREASURER, JOAN C.  
COREY, AS VICE PRESIDENT/ BUSINESS  
AGENT, PETER S. BERRY, AS  
RECORDING SECRETARY, MILTON  
DEPINA, INDIVIDUALLY AND AS UNION  
REPRESENTATIVE, NICO CATANO,  
INDIVIDUALLY AND AS UNION  
TRUSTEE, ERIC LOGAN, INDIVIDUALLY  
AND AS UNION REPRESENTATIVE,  
DAVID SMITH, INDIVIDUALLY AND AS  
UNION REPRESENTATIVE, BRIAN J.  
HATCH, INDIVIDUALLY AND AS  
BUSINESS AGENT,

And

JOHN DOES 1-100; and all others conspiring,  
acting in concert, or otherwise participating  
with them or acting in their aid or behalf,

DEFENDANTS.

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CIVIL ACTION NO. 1:25-cv-11990-BEM

**SUPPLEMENTAL AFFIDAVIT OF JILLIAN FOLGER-HARTWELL**

I, Jillian Folger-Hartwell, hereby declare and state as follows:

1. I am an attorney with the law firm of Littler Mendelson, P.C. I am one of the attorneys representing Plaintiffs Allied Waste North America LLC and 623 Landfill, Inc. (collectively "Republic") in the above-captioned case.

2. I have personal knowledge of the facts stated in this declaration, and could and would competently testify to them if called upon to do so.

3. I have served personal and proper notice of this lawsuit and the hearing scheduled for 2:15 p.m. on July 21, 2025, via email and hand-delivery on Chiefs of Police for the following towns:

Boston Police Department  
Canton Police Department  
Holbrook Police Department  
Peabody Police Department  
Quincy Police Department  
Revere Police Department  
Quincy Police Department

Signed under the penalties of perjury this 21st day of July, 2025.

/s/ Jillian S. Folger-Hartwell  
Jillian S. Folger-Hartwell

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of July, 2025, a true copy of the foregoing document was filed electronically through the Court's CM/ECF system, is available for viewing and downloading from the ECF system, will be sent electronically to counsel of record as registered participants identified on the Notice of Electronic Filing and via first class mail to all non-registered participants identified on the Notice of Electronic Filing.

/s/ Jillian S. Folger-Hartwell  
Jillian S. Folger-Hartwell